



**Update**

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**Affected Programs:** BadgerCare Plus, Medicaid  
**To:** Hospital Providers, HMOs and Other Managed Care Programs

## **Information for Eligible Hospitals Regarding Program Year 2015 of the Wisconsin Medicaid Electronic Health Record Incentive Program**

This *ForwardHealth Update* provides information for Eligible Hospitals regarding Program Year 2015 of the Wisconsin Medicaid Electronic Health Record Incentive Program.

### **Start of Program Year 2015**

#### ***Adopt, Implement, and Upgrade***

Beginning June 15, 2015, Eligible Hospitals participating in their first payment year of the Wisconsin Medicaid Electronic Health Record (EHR) Incentive Program will be able to apply for incentive payments for adopting, implementing, and upgrading to certified EHR technology (CEHRT) in their first year of participation.

#### ***Meaningful Use***

As a result of a published notice of proposed rulemaking (NPRM) regarding modifications to Meaningful Use for Program Years 2015 through 2017, which was published by the Centers for Medicare and Medicaid Services (CMS) on April 15, 2015, the Wisconsin Medicaid EHR Incentive Program will accept applications for Meaningful Use incentive payments at a later date. The proposed requirements in the NPRM affecting Program Years 2015 through 2017 can be found in the Federal Register at [www.gpo.gov/fdsys/pkg/FR-2015-04-15/pdf/2015-08514.pdf](http://www.gpo.gov/fdsys/pkg/FR-2015-04-15/pdf/2015-08514.pdf).

Once the regulations have been finalized later this year, the Wisconsin Medicaid EHR Incentive Program will communicate information on Meaningful Use and future Program Year 2015 changes.

*Note:* Emails from the Wisconsin Medicaid EHR Incentive Program are sent to the contact person provided during the Medicare and Medicaid EHR Incentive Program Registration and Attestation System process. The name indicated in the "From" line for these emails is [DHSEHRIncentiveProgram@dhs.wisconsin.gov](mailto:DHSEHRIncentiveProgram@dhs.wisconsin.gov).

### **Grace Period to Apply for Program Year 2015**

Per the CMS Stage 2 Final Rule from 2012, the EHR reporting period for the Wisconsin Medicaid EHR Incentive Program in Program Year 2015 included the dates from October 1, 2014, through September 30, 2015. Eligible Hospitals also have an additional grace period at the end of the Program Year to apply for an incentive payment. Currently, under the Proposed Rule, the last day for Eligible Hospitals to submit Program Year 2015 applications is January 31, 2016. Any extensions to the grace period will be communicated once the federal regulations on Program Year 2015 have been finalized.

## **Notifying Eligible Hospitals of Patient Volume and Medicaid Inpatient Bed Day Totals Used for Determining Eligibility for Incentive Payments**

The Wisconsin Medicaid EHR Incentive Program will send an email to an Eligible Hospital's contact person detailing information regarding the Eligible Hospital's patient volume and, if applicable, Medicaid Inpatient Bed Day total that will be used in determining eligibility for incentive payments. Eligible Hospitals will not be able to apply for Program Year 2015 until they receive this information.

### ***Patient Volume Used for Eligibility Determinations***

While determining eligibility for incentive payments for Program Year 2015, the Wisconsin Medicaid EHR Incentive Program will analyze a Wisconsin hospital's patient volume during the first quarter of the prior federal fiscal year (FFY). If the Eligible Hospital's patient volume during the first quarter of the prior FFY cannot be used to establish the FFY quarter eligibility period, the Wisconsin Medicaid EHR Incentive Program will analyze the Eligible Hospital's patient volume for subsequent quarters to determine if an FFY quarter eligibility period can be established for Program Year 2015. Wisconsin Medicaid will provide the Eligible Hospital's FFY quarter eligibility period for each facility.

ForwardHealth policy allows each Wisconsin hospital to submit all claims within 365 days from the date of service. A Wisconsin hospital's claims are used to analyze patient volume in the eligibility determination process. The Wisconsin Medicaid EHR Incentive Program will be able to begin eligibility determination for all Wisconsin hospitals starting January 1 of each calendar year.

### ***Medicaid Inpatient Bed Day Totals***

The payment amount Eligible Hospitals receive is calculated during their first year of participation in the Wisconsin Medicaid EHR Incentive Program. To assist Eligible Hospitals with the information needed within the application to determine the payment amount, Wisconsin

Medicaid will provide Eligible Hospitals that have not previously participated in the Wisconsin Medicaid EHR Incentive Program with their Medicaid Inpatient Bed Day totals. Eligible Hospitals are required to use the information provided by the Wisconsin Medicaid EHR Incentive Program when completing their application.

## **Certified Electronic Health Record Technology**

In Program Year 2015, all Eligible Hospitals are required to use CEHRT that meets the criteria outlined in the Office of the National Coordinator for Health Information Technology's (ONC) 2014 Edition Standards & Certification Criteria Final Rule, regardless of the stage of Meaningful Use they are demonstrating. For further information, Eligible Hospitals should refer to the Certified Electronic Health Record Technology topic (topic #16861) in the An Overview chapter of the EHR Incentive Program section of the Hospital, Inpatient service area of the ForwardHealth Online Handbook.

### ***New Documentation Requirements***

Beginning in Program Year 2015, all Eligible Hospitals, regardless of their year of participation in the Wisconsin Medicaid EHR Incentive Program, will be required to submit at least *one* of the following with their Wisconsin Medicaid EHR Incentive Program application to document their acquisition of 2014 Edition CEHRT:

- Contract.
- Lease.
- Proof of purchase.
- Receipt.
- Signed and dated vendor letter.

All of the following must be identified on the submitted documentation, regardless of format:

- Vendor.
- Product.
- Product version number.

Eligible Hospitals are reminded that they are required to retain supporting documentation for their Wisconsin

Medicaid EHR Incentive Program application for six years post-attestation.

### *Uploading Documentation*

Required supporting documentation must be uploaded through the Application Submission (Part 1 of 2) page in the Submit section of the Wisconsin Medicaid EHR Incentive Program application. Only Microsoft® Word, Microsoft® Excel, and Portable Document Format (PDF) files of two megabytes or less can be uploaded. For specific instructions on uploading required supporting documentation, refer to the Wisconsin Medicaid Electronic Health Record Incentive Program User Guide for Eligible Hospitals on the Portal User Guides page of the ForwardHealth Portal at [www.forwardhealth.wi.gov/WIPortal/content/Provider/userguides/userguides.htm.spage](http://www.forwardhealth.wi.gov/WIPortal/content/Provider/userguides/userguides.htm.spage).

### **Meaningful Use**

Hospitals can begin receiving EHR incentive payments in any FFY from FFY 2011 to FFY 2015. The section below explains how Dual Eligible Hospitals and Wisconsin Medicaid-Only Eligible Hospitals progress through the stages of Meaningful Use.

### ***Dual Eligible Hospitals***

Dual Eligible Hospitals, which are hospitals participating in both the Medicare EHR Incentive Program and the Wisconsin Medicaid EHR Incentive Program, are required to report Meaningful Use measures to CMS. When applying for a Wisconsin Medicaid EHR Incentive Program payment, Dual Eligible Hospitals are required to attest to eligibility criteria but are not required to report Meaningful Use measures since they already reported the measures to CMS. The CMS will communicate the following to the Wisconsin Medicaid EHR Incentive Program:

- The Meaningful Use measures the Dual Eligible Hospital reported to CMS.
- Whether or not the Dual Eligible Hospital meets Meaningful Use requirements.

The Wisconsin Medicaid EHR Incentive Program will only approve a Dual Eligible Hospital's application for a

Wisconsin Medicaid EHR Incentive Program payment if CMS approves the reported Meaningful Use measures and if the Dual Eligible Hospital meets eligibility requirements.

### ***Wisconsin Medicaid-Only Eligible Hospitals***

Eligible Hospitals participating in their first year do not have to attest to Meaningful Use; rather, they may demonstrate that they have adopted, implemented, or upgraded CEHRT.

Information regarding Meaningful Use stages and required EHR reporting periods (i.e., 90-day reporting period or entire year) for Program Year 2015 will be confirmed when CMS issues its final rule for Program Years 2015 through 2017, which will include modifications to Meaningful Use.

The current proposed rule:

- Streamlines reporting by removing measures that have become redundant, duplicative, and that have reached wide-spread adoption.
- Modifies patient action measures in two Stage 2 Meaningful Use core set objectives related to patient engagement.
- Aligns the EHR reporting period for Eligible Hospitals and critical access hospitals with the full calendar year.
- Changes the EHR reporting period in Program Year 2015 to a 90-day period to accommodate modifications.

The *ForwardHealth Update* is the first source of program policy and billing information for providers.

Wisconsin Medicaid, BadgerCare Plus, SeniorCare, and Wisconsin Chronic Disease Program are administered by the Division of Health Care Access and Accountability, Wisconsin Department of Health Services (DHS). The Wisconsin AIDS Drug Assistance Program and the Wisconsin Well Woman Program are administered by the Division of Public Health, Wisconsin DHS.

For questions, call Provider Services at (800) 947-9627 or visit our website at [www.forwardhealth.wi.gov/](http://www.forwardhealth.wi.gov/).

P-1250